From: <u>Darman, Leslie</u>
To: <u>Engelman, Alexa</u>

Subject: FW: Call with Region 9 (CA UIC/Tribal DW)
Date: Friday, August 07, 2015 7:10:00 PM

HI there – if not obvious, I meant to say I was not invited to the meeting. Also, I ended up working the whole day.... How did the meeting go?

Leslie Darman
Office of General Counsel
Water Law Office
202-564-5452

From: Darman, Leslie

Sent: Friday, August 07, 2015 9:29 AM

To: Engelman, Alexa

Subject: RE: Call with Region 9 (CA UIC/Tribal DW)

Hi Alexa - -thanks for letting me know about the meeting with OGWDW. I must been invited, but I'll be on leave starting at 12:30 anyway, so I would have only been able to be on the call for 30 minutes. In looking at the briefing paper below, I notice a discussion of Class I wells. Are there Class I wells at issue? After 12:30 I'll be on leave until Aug. 17, so let's re-convene when we are both back. Happy Trails!

Leslie Darman
Office of General Counsel
Water Law Office
202-564-5452

From: Engelman, Alexa

Sent: Thursday, August 06, 2015 2:05 PM

To: Darman, Leslie

Subject: FW: Call with Region 9 (CA UIC/Tribal DW)

FYI wanted to you know that we're having an update with HQ tomorrow on the status of the corrective action work with the State. If you want to chat further, let me know, I'm trying to get some FOIA work and a filing out today but I'm around tomorrow and next week through midday Wed. Headed to eastern Sierras after for a backpacking trip through the following Sunday!

Hope all is well,

Alexa

From: Albright, David

Sent: Thursday, August 06, 2015 10:59 AM

To: Grevatt, Peter

Cc: Mason, Paula; Montgomery, Michael; Dermer, Michele; McWhirter, Lisa; Engelman, Alexa;

Moffatt, Brett; Li, Corine

Subject: Call with Region 9 (CA UIC/Tribal DW)

Hi Peter,

For our call tomorrow (scheduled 9am-10am PDT), Mike asked that I forward the outline below regarding the CA Class II UIC program. We can also update you on tribal drought issues. Thanks, David

CA UIC Program

- * July 15th State Submittal
 - Preliminary assessment of 11 aquifers (HTAE)
 - 1) 1 of the 11 may not be USDW; most or all of the others may not meet AE criteria
 - 2) 5 of the 11 have no active injection
 - 3) State expects at least 1 operator in the 11 to come forward with data/AE request
- No requests for AEs for disposal wells injecting into sub-3,000 ppm TDs aquifers (7/15/15 target date for state submittal)
 - 1) Disposal wells into sub-3,000 aquifers required to shut down 10/15/15
- 2) State is reviewing one package; likely public notice starting in August (Arroyo Grande)
 - Proposed plan and schedule for comprehensive Class II program improvements
 - Outline of proposed public participation in State's AE process
 - EPA reply letter
 - 1) Timing of final determinations by state of 11 aquifers HTAE (11/15/15 target)
- 2) With no AE submittals, all Cat 1 wells in sub-3,000 aquifers (\sim 50-60??) will cease injection by 10/15/15 per state's regulations
- * July 31st State Submittal
 - Initial review of 5,675 Category 2 wells (EOR wells)
 - 1) EOR well breakdown (85% cyclic steam; 12% steam flood; 3% other)
 - 2) For thermal enhanced recovery wells (97% of Cat 2) no further analysis
- 3) 24 Cat 2 wells still under review; State may/will issue information orders and take action as needed
 - 4) EPA response to July 31st submittal
- * Other Key Items
 - State's emergency/permanent regulations

- Category 1 well evaluations
- Class I injection wells
- Congressional and 3rd party interests/calls
- Contract support available for EPA review of CA AEs

- Upcoming dates/milestones

August 21, 2015: EPA/SB meeting on Class I wells

October 15, 2015: Shut-in of Cat 1 wells in sub-3,000 ppm TDS aquifers if no

ΑE

November 15, 2015: Target for 90% of Cat 1 AE requests, 100% of

determinations for the 11 aquifers HTAE

February 15, 2016: Target for 90% of Cat 2 AE requests

David Albright | Drinking Water Protection Section | EPA Region 9 San Francisco | 415 972-3971